

WEIL, GOTSHAL & MANGES LLP
Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER & BENVENUTTI LLP
Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

* All papers shall be filed in the Lead Case, No. 19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDERS BY
DEFAULT ON MOR DEADLINES AND FORM
MODIFICATION MOTION
[Re: Dkt No. 1788]**

Date: June 26, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: June 19, 2019
4:00 p.m. (Pacific Time)

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
3 “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-
4 captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of
5 the Bankruptcy Local Rules for the United States District Court for the Northern District of California,
6 as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain*
7 *Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter an order by default on the *Application Pursuant to L.B.R.*
9 *2015-2(e) and 11 U.S.C. § 105(a) for an Order Modifying Debtors’ Deadlines for Filing Monthly*
10 *Operating Reports and Approving Proposed Modifications to Form of Monthly Operating Reports* [Dkt
11 No. 1788] (the “**Application**”).

12 **RELIEF REQUESTED IN THE APPLICATION**

13 The Application seeks entry of an order (a) modifying the deadlines, as required under
14 section 521 of the Bankruptcy Code and Bankruptcy Local Rule 2015-2(a), for the Debtors to file
15 monthly operating reports (“**Monthly Operating Reports**”) to coincide with their reporting
16 requirements to the Securities and Exchange Commission (the “**SEC**”), and (b) approving certain
17 modifications to the form of Monthly Operating Reports required under Bankruptcy Local Rule 2015-
18 2(d) to conform with the Debtors’ existing reporting processes and procedures. A proposed order was
19 attached as an exhibit to the Application.

20 **NOTICE AND SERVICE**

21 A *Notice of Motions to be Heard at May 22, 2019 Omnibus Hearing* was filed
22 concurrently with the Application on May 1, 2019 [Dkt. No. 1807] (the “**Notice of Hearing**”). The
23 Application, its supporting Declaration of John Boken, and the Notice of Hearing were served as
24 described in the Certificate of Service of Jesse A. Offenhartz filed on May 15, 2019 [Dkt. No. 2022].

25 On May 10, 2019, the Debtors filed a *Notice of Continued Hearing on MOR Deadlines*
26 and *Form Modification Motion* [Dkt No. 1973], which continued the hearing on the Application to June
27 11, 2019, at 9:30 a.m. (Pacific time).

28 On May 31, 2019, the Debtors filed a *Second Notice of Continued Hearing on MOR*

1 *Deadlines and Form Modification Motion* [Dkt No. 2302], which continued the hearing on the
2 Application to June 26, 2019, at 9:30 a.m. (Pacific time), and further extended the deadline for parties
3 to file responses or oppositions to the Application to June 19, 2019, at 4:00 p.m. (Pacific time).

4 The deadline to file responses or oppositions to the Application has passed, and no
5 oppositions or responses have been filed with the Court or received by proposed counsel for the Debtors.
6 The Office of the United States Trustee (the “U.S. Trustee”) gave informal comments to the Debtors, as
7 a result of which the Debtors and the U.S. Trustee have agreed on the revised form of Proposed Order
8 attached hereto as **Exhibit A**.

9 **DECLARATION OF NO RESPONSE RECEIVED**

10 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
11 that:

- 12 1. I am a partner of the firm of Keller & Benvenutti LLP, co-counsel for the Debtors.
13 2. I have not received any response or opposition to the Application.
14 3. I have reviewed the Court’s docket in the Chapter 11 Cases and have determined
15 that no response or opposition has been filed with respect to the Application.
- 16 4. This declaration was executed in San Francisco, California.

17 WHEREFORE, the Debtors hereby request entry of an order substantially in the form
18 attached hereto as **Exhibit A**, granting the Application as set forth therein.

19 Dated: June 20, 2019

20 **WEIL, GOTSHAL & MANGES LLP**
KELLER & BENVENUTTI LLP

21 By: /s/ Jane Kim
22 Jane Kim

23 *Attorneys for Debtors*
24 *and Debtors in Possession*